

## EXHIBIT 66

# MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO**

14 ANIBAL RODRIGUEZ, JULIEANNA MUNIZ,  
15 ELIZA CAMBAY, SAL CALTADO, EMIR  
GOENAGA, JULIAN SANTIAGO, HAROLD  
16 NYANJOM, KELLIE NYANJOM, and SUSAN  
LYNN HARVEY individually and on behalf of  
all other similarly situated,

Case No. 3:20-CV-04688 RS

17 **Plaintiffs**  
**vs**  
18 **Defendant.**  
**DEFENDANT GOOGLE LLC'S**  
**RESPONSES TO PLAINTIFFS'**  
**REQUESTS FOR ADMISSION,**  
**SET FOUR**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17th Floor  
Action Filed: July 14, 2020  
Trial Date: Not Set

22 PROPOUNDING PARTY: Plaintiffs Anibal Rodriguez, Sal Cataldo, Julian Santiago, and  
23 Susan Lynn Harvey ("Plaintiffs")

24 RESPONDING PARTY: Defendant Google LLC

25 SET NO.: Four

1 Google further objects to this Request to the extent that it seeks information protected by  
 2 the attorney-client privilege and/or the attorney work product doctrine.

3 Subject to and without waiving the foregoing objections, Google responds as follows:  
 4 Denied.

5 **REQUEST FOR ADMISSION NO. 36:**

6 Since the start of the Class Period, Google has maintained at least one dashboard, log, or  
 7 table that reliably tracks WAA and sWAA “on-and-off events for all Google Account Ids on an  
 8 individual level.” (citing Google’s Resp. to Interrogatory No. 13). For purposes of this Request,  
 9 “reliably” means that the dashboard, log, or table is accurate.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

11 Google objects to this Request as vague and ambiguous.

12 Google also objects that the request is compound.

13 Google also objects that the term “dashboard, log, or table” is vague and ambiguous.

14 Google also objects that the term “reliably tracks” is vague and ambiguous.

15 Google further objects to this Request to the extent that it seeks information protected by  
 16 the attorney-client privilege and/or the attorney work product doctrine.

17 Subject to and without waiving the foregoing objections, Google responds as follows:

18 Admitted.

19 **REQUEST FOR ADMISSION NO. 37:**

20 Google has used WAA-Off Data to track, model, or measure conversions that occur across  
 21 Google and non-Google properties. This Request refers to a scenario in which a User interacts  
 22 with an advertisement within a Google app, or while on a Google website, and then “converts”  
 23 with respect to that prior advertisement within a non-Google app or non-Google website  
 24 (including but not limited to by making a purchase, installing an app, opening an app, or filling out  
 25 a form). This Request also includes the inverse scenario, where a User interacts with an  
 26 advertisement within a non-Google app, or while on a non-Google website, and then “converts”  
 27 with respect to that prior advertisement within a Google app or while on a Google website  
 28 (including but not limited to by making a purchase, installing an app, opening an app, or filling out

1 **REQUEST FOR ADMISSION NO. 51:**

2 Google saves WAA-Off Data generated during Users' interactions with the Google  
3 Chrome app, including through webviews on Non-Google Apps.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

5 Google objects to this Request as vague and ambiguous.

6 Google also objects that the request is compound.

7 Google also objects that the term "saves" is vague and ambiguous.

8 Google also objects that, as defined, the term "Users'" is vague, ambiguous, and  
9 overbroad.

10 Google also objects that the term "WAA-Off Data" is unintelligible and so overbroad as to  
11 be meaningless.

12 **REQUEST FOR ADMISSION NO. 52:**

13 Google Firebase, Google Analytics for Firebase, AdMob, and Cloud Messaging are not  
14 essential to the functioning of Non-Google Apps.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

16 Google objects to this Request as vague and ambiguous.

17 Google also objects that the term "essential" is vague and ambiguous.

18 Google also objects that the term "functioning" is vague and ambiguous.

19 Google also objects that the request is irrelevant.

20 Google further objects to this Request to the extent that it seeks information protected by  
21 the attorney-client privilege and/or the attorney work product doctrine.

25 Dated: October 31, 2022

WILLKIE FARR & GALLAGHER LLP

27 By: /s/ Benedict Y. Hur  
28 Benedict Y. Hur

*Attorneys for Defendant Google LLC*

## **PROOF OF SERVICE**

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is Willkie Farr & Gallagher LLP, One Front Street, San Francisco, CA 94111.

On October 31, 2022, I served the following document(s) on the individuals identified below:

**- DEFENDANT GOOGLE LLC'S RESPONSES TO PLAINTIFFS' REQUESTS  
FOR ADMISSION, SET FOUR**

by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe “pdf” format. The transmission was reported as complete and without error.

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33 *Attorneys for Plaintiffs*

34 Executed on October 31, 2022 at San Francisco, California.

35 I declare under penalty of perjury under the laws of the United States that the above is true  
36 and correct.

37 \_\_\_\_\_  
38 */s/ Celeste Peifer*  
39 Celeste Peifer